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To Regina.Belt@usdoj.gov, Cara Steiner-Riley/R10/USEPA/US@EPA, Margo Young/R10/USEPA/US@EPA

cc Terry Leitzell <TerryL@IcicleSeafoods.com>

bcc

Subject Northern Victor and Waste Pile A

History: This message has been forwarded.

Attached is our proposal. Dan Block is sending the proposal, without the cost estimate, to ADEC.

Terry

Terry L. Leitzell
General Counsel
Icicle Seafoods, Inc.


Cleanup plan.doc


Copy of Pile A Prelim Cost est.xls


Dump sites.pdf

Equipment

The contractor proposes to use the 197' x 52' deck barge KASHEGA with a 150 ton Manitowoc 4000W crane aboard fitted with a 17 cubic yard clamshell scoop to pick up the waste material from the seafloor. The crane has a boom length of 150 feet. The deck barge will be anchored on a four point system for accurate positioning and repositioning throughout the operation. The tug REDEEMER will be used to mobilize the crane barge out of Dutch Harbor and to maneuver the barge as needed during operations.

Two vessels will haul the dredged material offshore for deepwater dumping. The MAKUSHIN BAY is a 130 x 30 foot converted trawler owned by Magone Marine which can handle approximately 130 cubic yards on deck. The IMPALA, owned by Icicle Seafoods, is a 165 x 36 foot oil supply vessel with a very large, low deck that should be able to haul in excess of 200 cubic yards of material.

The REDEEMER will carry a full complement of diver support equipment including the OSHA-required double lock hyperbaric recompression chamber for deep water diving operations.

Monitoring

Before the waste pile removal operation begins, a full visual dive survey of the pile and perimeter will be done by Magone Marine divers. The perimeter will be marked with anchors and surface buoys for reference during the dredging process. At periodic intervals, depending on the visibility, the progress will be checked by visual dive survey with results recorded. Throughout the dredging process visual water surface surveys will be conducted and recorded noting the degree of turbidity, any surface scum, the size of the plume that forms and the presence of any sea life or birdlife.

The crane operator will take care to observe the contents of each clamshell scoop load in order to minimize the disturbance to the seabed by digging deeper than the material pile. Fresh mud showing on the scoop will indicate that the scoop must move to a new spot. When practical, video recording on a daily basis will provide a visual record of the composition of the dredged material picked up and dumped to deep water.

At such time the dredging operation appears to be finished, another visual dive survey will be conducted to determine if any and how much material is left to be picked up by other means. When the pile removal is completed, a final visual dive survey will be conducted to show the state of the seafloor. Future sea floor surveys will be conducted at the direction of EPA to determine what sea life is returning to the site and if there are any post-removal effects.

All log entries, visual surveys, observations, and load data will be compiled in a final report and will be made available to EPA and ADEC on request.

Dewatering

The clamshell scoop on the crane will be modified with expanded steel mesh to minimize the unwanted escape of waste material while being raised through the water column. While this is not a perfect solution, the scoop will be raised vertically through the water so that any particle fallout will tend to float back down onto the pile for pickup in subsequent scoops.

Both hauling vessels will be extensively fitted with heavy tarps against the bulwarks to contain the material dumped by the clamshell crane. At various positions

NORTHERN VICTOR
Waste Pile Removal Plan for Udagak Bay

Plan Overview

This plan addresses key elements of the removal of the waste pile designated as "Pile A" deposited in Udagak Bay by Victor Seafoods prior to 1992. The pile is comprised mainly of fish bones discarded from fish processing operations and is approximately 330 feet long and 260 feet wide and 7-1/2 feet deep at its thickest point. It lies beneath the surface some 83 feet at approximate location of 53* 44' N, 166* 19' 41" W. The volume of the material in the pile is estimated at 6000 cubic yards.

Removal of the waste pile is mandated in the EPA permit for the processing vessel NORTHERN VICTOR which continues to operate nearby. Removal of the waste pile is also for purposes of habitat restoration in efforts to facilitate the lifting of the "impaired" status of the Udagak Bay.

Removal is proposed to be contracted to a local Dutch Harbor contractor, Magone Marine, who will utilize a clamshell dredge operating from an anchored barge to pick up the material. Two additional vessels will be utilized to haul the material to an approved offshore dumping location on a rotation in order to maximize the dredge crane time.

Time frame

Because of ongoing processing operations in Udagak Bay near Pile A the cleanup operation must occur during a time of non-production on board the NORTHERN VICTOR. The reason for concern is the high likelihood of factory water quality being negatively affected during periods of actual dredging. Historical data suggests a reasonable start date between October 1 and October 15, 2006. The time estimate to complete the removal ranges from 10 to 20 days on site depending on weather and other factors. However, ample time exists prior to the ship returning in early January 2007 if there was an unexpected delay.

Bad weather that could negatively affect the cleanup operation is expected to become a greater factor the later the start date of the project. With that in mind, the operation should commence as soon as the NORTHERN VICTOR Pollock "B" season is concluded and the vessel departs. The contractor will need prior notice of commitment to the operation of at least one month.

EPA and Alaska DEC Approval

This plan is a proposal assembled by the contractor and Icicle Seafoods strictly for the purposes of pile removal. It is subject to minor changes as conditions dictate; however, every effort will be made to operate within the guidelines stated. Prior approval will be obtained from both agencies for the procedures proposed and for a waiver of current water quality standards at the both the dredging site and the dump location to allow for the inevitable mud and silt plume. Upon being provided a contact person at both agencies, contact will be made with those persons if for any reason the operation must depart from the guidelines in this plan.

in the "fence", expanded steel-reinforced silt fence fabric will be fitted and secured in order to dewater the load without letting solids escape.

Hauling and Dumping

The boats doing the hauling will calculate by best estimate the volume of each load of material to be dumped. This will be done by measuring the average depth of material on deck and the area of the load thus determining the cubic yards. Additionally, each boat will record the date, time of day and starting and ending positions for each load dumped.

Material will be dumped at one of two approved dump sites meeting the requirements of offshore dumping in the NPDES permit for the NORTHERN VICTOR; that is, at least 1 nautical mile from the shoreline and in waters over 120 feet deep MLLW. The dump sites proposed by Icicle Seafoods are both circular areas of two miles diameter centered at the following positions.

North Dump location: 53* 40' 22" N, 166* 13' 14" W
South Dump location: 53* 50' 5" N, 166* 18' 18" W

Having two dump sites available will allow the operators to continue in stormy weather conditions regardless of the wind direction.

When the hauling boat arrives at one of the dump sites, it will reduce speed to 3 knots and maintain that speed during the dumping process but remaining inside the boundaries of the dump site. The aft end of the "fence" will be opened and water hoses will gradually flush the material over the stern. It is expected to take from 20 minutes to one hour to flush all the material off the deck. During that time, sea life and bird activity will be monitored and recorded. The weather will be recorded at time of dumping and visual surface observations will be recorded. The boat will then return to the dredge site for another load. Given the dump sites above, it is expected to take approximately 3 hours per round trip per boat. Working 10-12 hour days would allow removal of over 1000 cubic yards of material per day. As the material thins out on the bottom it will take longer to fill a hauling vessel.

At the time the removal is declared complete by the contractor, the vessels will be run or towed back to Dutch Harbor and the contract terminated.